



Overview of Agency-wide Risk Assessment Process Update for Fiscal Year 2007

We are pleased to share with you information about the Corporation's process for FY 2007 monitoring planning. As a federal agency, the Corporation is responsible for ensuring all federal resources are appropriately managed, which includes conducting monitoring visits to award recipients (e.g., grantees, cooperative agreement recipients, sponsors). Similar to many federal grant-making agencies, the Corporation moved to a standardized system in Fiscal Year (FY) 2006 to help prioritize monitoring activities and more generally allocate Corporation resources for appropriate levels of monitoring, oversight, and technical assistance. We identified a standard set of criteria as indicators of potential programmatic or financial vulnerability in the management of federal funds, and we conduct a yearly assessment of each Corporation award using the assessment criteria. We will continue to be proactive to further enhance and strengthen our tool over time, particularly during the first years of implementation.

It is important to note that while the risk assessment tool generates priority levels for monitoring planning purposes, the designated levels are not indicators of a recipient's actual performance. Additionally, funding decisions or holds placed on award funds are made in accordance with Corporation policy and procedures and are not a direct result of the risk assessment process.

Below is some general information about the assessment process and how the Corporation uses the information.

What the risk assessment process is...

- A Corporation-wide internal resource management tool - a way to help prioritize monitoring activities, use of staff, and use of travel funds.
- A tool that generates priority levels (i.e., "high," "medium," and "low") for monitoring planning purposes.
- A standard set of criteria used by program officers and grants officers to help identify potential vulnerabilities in managing federal resources.
- A way to help identify potential training and technical assistance needs.
- An information source to help develop a comprehensive monitoring plan across all Corporation programs.
- Consistent with risk assessment processes used by many other federal grant-making agencies.

What the risk assessment process is not...

- A process to make judgments about a recipient's actual performance.
- Used to determine eligibility or award decisions or holds placed on award funds.

What does this mean to me as an award recipient?

- This information is being provided to you for your information only.
- You are not expected to do anything in response to this information.
- The risk assessment process will not add burden or new requirements for Corporation recipients, as this is a change to internal Corporation processes, not recipient processes.

What does this mean to the Corporation?

- Consistency across Corporation programs in how we prioritize monitoring activities and use monitoring resources (e.g., staff, travel funds).
- Greater coordination between the program and financial components of program administration.
- Prioritization of training and technical assistance resources.

What if I have any questions?

- Please contact your CNCS Program Officer if you have any questions regarding this process.



Document:

CORPORATION-WIDE
RISK ASSESSMENT
CRITERIA DESCRIPTIONS
MONITORING FY 2007

Revision:

06/27/2006

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Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: NEW CNCS RECIPIENT		
Responsible Lead: Grants Officer	Revision: 06/27/2006	Page: 1

1. **Risk Assessment Category:** Organizational
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “New CNCS Recipient” within the “Organizational” assessment category.
3. **Criterion Summary Statement:** A “new CNCS recipient” is an organization that has never before received a federal assistance activity (e.g., grant, cooperative agreement, sponsored program) directly from the Corporation.

Previous experience as a CNCS recipient (or VISTA sponsor) is acknowledged as a potentially useful indicator of lower vulnerability, as it may evidence some familiarity with Corporation program operation, oversight, and reporting practices. Accordingly, a successful grant/sponsorship agreement applicant without such experience should be identified.

4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) New CNCS Recipient: An organization that has not previously directly received a grant from the Corporation and is in its first year of its grant from the Corporation. (Continuation/renewal years do not constitute a new CNCS recipient under this criterion.)
5. **User Instructions:** A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
 - “Yes” response - required when any one of these factors are met:**
 - (a) Other than the grant currently in place, the recipient/sponsor has never previously had a direct grant or sponsorship agreement from the Corporation.
 - “No” response - required when:** None of the factors described above are met.
 - “N/A” response - not a selection option for this criterion.**
6. **Examples:**

A “Yes” response to this criterion is appropriate in instances such as:

 - (a) In July, the grantee/sponsor is in its first year of its first grant/sponsorship agreement with the Corporation.

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7. **Source Documentation (Where to Look):** The source documentation which supports the determination of “Yes” for this criterion are:
 - (a) Self-identification by the approved applicant/grantee;
 - (b) eGrants query results.
8. **Comments Required in Risk Assessment eGrants Record:**
 - (a) When there is a determination of “Yes” for this criterion, no comments are necessary.
 - (b) When there is a determination of “No” for this criterion, no comments are necessary.
9. **Reference Documents and Other Resources:** None
10. **Control and Maintenance.** Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: NEW FEDERAL AWARD RECIPIENT		
Responsible Lead: Grants Officer	Revision: 06/27/2006	Page: 3

1. **Risk Assessment Category:** Organizational
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “New Federal Award Recipient” within the “Organizational” assessment category.
3. **Criterion Summary Statement:** A “new federal award recipient” is an organization that has not had a grant/federal assistance activity from another federal agency within the past two years.

While a recipient/sponsor may be new to the Corporation, previous experience as a recipient of another federal agency may actually reduce the risk of poor performance by that grantee organization. While other agencies have programs with grant types, conditions, and funding amounts that are different than the Corporation’s programs, this criterion considers federal grant experience to be valuable and transferable. This criterion does not attempt to distinguish the relative performance of a recipient under a grant from another federal agency.

4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) New Federal Award Recipient: An organization that has not received a grant or other form of federal assistance activity from another federal agency within the past two (2) calendar years.
5. **User Instructions:** A “Yes,” “No,” or “Not Applicable (N/A)” response is required for this criterion. A “Yes” response is an indication that the factor is present.
 - “Yes” response - required when any one of these factors are met:**
 - (a) The grantee/sponsor is new to the Corporation *and* has not been awarded a grant by another federal agency within the previous two (2) calendar years.
 - “No” response - required when:**
 - (a) The grantee/sponsor is new to the Corporation *and* has been awarded a grant by another federal agency within the previous two (2) calendar years.
 - “N/A” response – required when:**
 - (a) The grantee is not a new grantee/sponsor to the Corporation (i.e., the determination for the “New CNCS Recipient” criterion is “No” for this award/grant).

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6. Examples:

- A “Yes” response to this criterion is appropriate in instances such as:
 - (a) As of the date of the assessment, the recipient/sponsor is new to CNCS and has not received an award from another federal agency within the last two calendar years as indicated through the Financial Management Survey, Grants Officer Certification Module (e.g., submission of A-133 audit), or the SF990 through Guidestar.
- A “No” response to this criterion is appropriate when:
 - (b) In July 2005, a CNCS recipient/sponsor received a grant from another federal agency (e.g., Department of Justice (DOJ), Health and Human Services (HHS)) earlier in 2005 or during 2004 or 2003.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” or “No” for this criterion are:

- (a) Grant Award Application;
- (b) eGrants – Grants Officer Certification Module;
- (c) SF-990 (tax form);
- (d) Financial Management Survey (for award amounts over \$100,000) – Specifically, responses to questions regarding whether the organization has received a federal grant or cost-type contract award in the last two years (Question #2) or whether the organization has completed an A-133 audit within the past two years (Question #5) provide source information.

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, no comments are necessary.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.
- (c) When there is a determination of “N/A” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: None

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: STAFFING CHANGES		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 5

1. **Risk Assessment Category:** Organizational
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Staffing Changes” within the “Organizational” assessment category.
3. **Criterion Summary Statement:** Vulnerabilities are associated with recent changes in key staff responsible for operating the CNCS funded grant or project, and with key staff positions which are left unfilled or exhibit a pattern of frequent turnover during the assessment period. Changes in key staff and unfilled key staff positions are factors due to the need to ensure the transfer of grant-specific knowledge and operational requirements between individuals.

“Staffing” refers specifically to key staff who are directly associated with the operation of CNCS funded programs, the supervision of a VISTA, or the state commission board. It is assumed that the adequacy of staff in relation to their ability to operate the program, both in number and appropriate background, was determined to be adequate and appropriate when the program was initiated and funded. This criterion is based upon post-award change and considers staff changes within the last 6 months, a pattern of staff changes within the last 12 months, long-standing vacant key staff positions, or non-compliance with state commission board composition requirements.

4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) Key Staff: Staff directly responsible for the programmatic or fiscal operation and/or management of the grant or project. For VISTA, “Key Staff” also refers to staff who supervise a VISTA.
 - (b) Recent Change: A change in staff within the last six (6) months.
5. **User Instructions:** A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
 - “Yes” response - required when any one of these factors are met:**
 - (a) One or more changes in key staff within the last 6 months or a pattern of changes within the last 12 months.
 - (b) One or more key staff positions left unfilled, with or without attempt to refill the position.
 - (c) Non-compliance with state commission board composition requirements.

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- “No” response - required when:** None of the factors described above are met.
- “N/A” response - not a selection option for this criterion.**

6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) The Program Director, who is responsible for programmatic oversight of the grant, leaves his/her position and no attempt is made to refill the position.
- (b) A VISTA project experiences frequent turnover of the VISTA Supervisor or does not attempt to replace a VISTA Supervisor who has vacated the position.
- (c) A state commission board is not compliant with the regulatory requirements for board composition.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” for this criterion are:

- (a) Outcomes from compliance visits;
- (b) Routine correspondence with the grantee;
- (c) Grantee budget changes which reduce staffing levels or eliminate key staff positions.

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, comments must briefly indicate the type of staff change and when the change occurred.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: None

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: CHANGE IN LEGAL APPLICANT / RESPONSIBLE PARTY		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 7

1. **Risk Assessment Category:** Organizational
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Change in Legal Applicant / Responsible Party” within the “Organizational” assessment category.
3. **Criterion Summary Statement: Vulnerability** is associated with a recent change in the legal applicant or the fiscal agent responsible for the grant/funded program.

Changes in the legal entity responsible for the programmatic and/or fiscal management of CNCS funded programs is a potential vulnerability because it could lead to a gap in required grant responsibilities. As such, changes in the legal entity which occur in the midst of a current award period must be identified. This criterion is based upon post-award change among the entities specified in the award.

4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) Legal Applicant: The organization that is legally responsible for the programmatic and/or fiscal management of CNCS funded programs.
 - (b) Fiscal Agent: The organization or agency that is responsible for the fiscal management of a CNCS funded program, but is not necessarily responsible for the programmatic management of the same program. For instance, this applies to State Commissions when a state agency is responsible for the management of their funds while the Commission is responsible for the programmatic management of their subgrantees.
5. **User Instructions:** A “Yes,” “No,” or “Not Applicable (N/A)” response is required for this criterion. A “Yes” response is an indication that the factor is present.

“Yes” response - required when any one of these factors are met:

- (a) The legal applicant changed during the post-award grant period.
- (b) The fiscal agent changed during the post-award grant period or is in the process of changing (e.g, notice given to the Corporation, application for change being processed).

“No” response - required when: None of the factors described above are met.

“N/A” response - required when:

- (a) This assessment criterion does not apply to VISTA or Senior Corps projects.

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6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) The legal applicant responsible for the grant changed from one non-profit to another non-profit during the post-award grant period.
- (b) A State Commission is relocated to a different state agency or converts to a separate 501(c)3 non-profit status.
- (c) The legal applicant, a well-known foundation that initially agreed to be the legal applicant for a consortium of non-profits, decides that the reporting burden for a Learn and Serve America (LSA) grant is too high and asks to be removed as the legal applicant. There is a letter from one of the partners asking to be the new legal applicant, yet the consortia partners were not vetted in GARP for their capacity to manage the grant and there is no documentation as to the capacity and experience of the proposed legal applicant.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” for this criterion are:

- (a) Notification from the recipient that the legal applicant or fiscal agent has or will change;
- (b) Outcomes from compliance visits;
- (c) A grant award that implemented a legal applicant / responsible party change.

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, comments must briefly indicate when the change occurred (or that the change is in the process of occurring) and provide the names of the former and new legal applicants.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.
- (c) When there is a determination of “N/A” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: None

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: TIME SINCE LAST MONITORING VISIT		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 9

1. **Risk Assessment Category:** Organizational
2. **Context:** This criterion establishes the Corporation-wide standard for assessing monitoring priority levels based upon “Time Since Last Monitoring Visit” within the “Organizational” assessment category.
3. **Criterion Summary Statement:** This criterion considers the amount of time that has passed since CNCS conducted an on-site monitoring visit (either programmatic or financial) for this award. For the purposes of this criterion, on-site monitoring visit includes any form of on-site compliance, targeted, or training/technical assistance visits and does not include on-site opportunity visits. Since potential vulnerabilities can increase as time between visits lengthens, it is necessary to consider this element in the overall priority level, especially if other factors are also present.

We recognize that grant numbers for the same recipient/sponsor under the same funding stream change every two or three years. Therefore, when determining the time lapse since the last visit, consider the recipient/sponsor and the funding stream as opposed to just the actual grant number itself. If the recipient/sponsor and the funding stream remain the same and the change is that of the cyclical grant number update (e.g., a Senior Corps grantee that has received RSVP project funding from CNCS for the past 10 years), then assess this criterion based on when CNCS conducted the last on-site monitoring visit for this recipient/sponsor and funding stream. This criterion applies only to recipients that have received funds from CNCS under the same funding stream for five years or more.

4. **Terms and Definitions:** Terminology unique to this criterion are: None
5. **User Instructions:** A “Yes,” “No,” or “Not Applicable (N/A)” response is required for this criterion. A “Yes” response is an indication that the factor is present.

“Yes” response - required when any one of these factors are met:

- (a) It has been more than five years (60 months) since a CNCS staff person conducted an on-site monitoring visit for this recipient/sponsor under this funding stream.
- (b) Based on a check in the specified source documentation (Section 7 below), the date of the last monitoring visit is unavailable or unknown.

“No” response - required when: None of the factors described above are met.

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“N/A” response – required when:

- (a) The grant (i.e., same recipient and funding stream) has received funding from CNCS for less than five years.

6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) It is July 2006 and the last on-site monitoring visit was conducted in October 2000.
- (b) After the checking the documentation sources, the date of the last monitoring visit could not be verified.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” for this criterion are:

- (a) eGrants Monitoring Module;
- (b) Electronic/hard copy documentation (e.g., VISTA monitoring activities schedule/standardized spreadsheet).

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, no comments are necessary.
- (b) When there is a determination of “No” for this criterion, comments must briefly indicate the month and year of the last on-site monitoring activity and reference the information source (e.g., eGrants; office spreadsheet). *Note:* For FY 2005 and forward (e.g., 2006, 2007), if the visit was done but not documented in eGrants, the appropriate documentation must be entered into the eGrants Monitoring Module.
- (c) When there is a determination of “N/A” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: None

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: PERFORMANCE MEASURES (DESIGN)		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 11

1. **Risk Assessment Category:** Programmatic
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Performance Measures (Design)” within the “Programmatic” assessment category.
3. **Criterion Summary Statement:** This criterion focuses on the design and quality of the performance measures themselves and relies on information obtained from applications for federal assistance and/or programmatic progress reports. Designating a recipient as having low quality or inadequate performance measures must be based on individual program standards for reasonable quality and progress for the period under review. As programs evolve with time, measures may become “inadequate” over time; thus, this is not a reflection on the individual Program Officer or project at the time the measures were negotiated.
4. **Terms and Definitions:** Terminology unique to this criterion are: None
5. **User Instructions:** A “Yes,” “No,” or “Not Applicable (N/A)” response is required for this criterion. A “Yes” response is an indication that the factor is present.
 - “Yes” response - required when any one of these factors are met:**
 - (a) The program officer believes that, when reviewed aggregately, the recipient has provided low quality or inadequate performance measures.
 - “No” response - required when:** None of the factors described above are met.
 - “N/A” response - required when:**
 - (a) The recipient does not have performance measures as part of their application/award and was not required to include performance measures as part of their proposal.
 - (b) The performance measures are still being negotiated as part of a new award.
6. **Examples:**

A “Yes” response to this criterion is appropriate in instances such as:

 - (a) The intermediate and end outcomes are actually outputs; when outcomes cannot be measured because they are too general or have too many variables; or, when performance measure activities do not correspond to the program’s stated goals in the narrative section of the application.

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- 7. Source Documentation (Where to Look):** The source documentation which supports the determination of a “Yes” or “No” for this criterion are:
- (a) The most recent application for funding or award amendment (performance measurement section).
 - (b) Other correspondence with the recipient regarding approved performance measures (as applicable for certain programs).
- 8. Comments Required in Risk Assessment eGrants Record:**
- (a) When there is a determination of “Yes” for this criterion, the comment ‘See Progress Report Feedback’ is required if sufficient to provide the source of the information; otherwise, a comment to direct to where to find the documentation of significant weakness with the performance measures is required.
 - (b) When there is a determination of “No” for this criterion, no comments are necessary.
 - (c) When there is a determination of “N/A” for this criterion, no comments are necessary.
- 9. Reference Documents and Other Resources:** None
- 10. Control and Maintenance.** Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion:		
OVERALL PROGRAMMATIC PROGRESS		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 13

1. **Risk Assessment Category:** Programmatic
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Overall Programmatic Progress” within the “Programmatic” assessment category.
3. **Criterion Summary Statement:** This criterion focuses on the overall progress of the project, including progress against the established performance measures, and relies on information obtained from recipient/grantee program progress reports and/or key documentation regarding project performance. Designating a recipient as having low quality and/or inadequate progress should be based upon an aggregate, general assessment of performance as reported in the programmatic progress report or as communicated with the grantee in key correspondence.

Note: A late or incomplete program progress report is *not* an indicator of potential vulnerability under this criterion; late and/or incomplete program progress reports are addressed under a separate criterion.

4. **Terms and Definitions:** Terminology unique to this criterion are: None
5. **User Instructions:** A “Yes,” “No,” or “Not Applicable (N/A)” response is required. A “Yes” response is an indication that the factor is present.

“Yes” response - required when any one of these factors are met:

- (a) The program officer believes that, when reviewed aggregately, the grantee has not either *made or reported* reasonable progress during the preceding performance period. In determining reasonable progress, the Program Officer assesses performance in the programmatic progress report. The determination of what constitutes reasonable, quality progress must be determined on a per-program basis and applied evenly to all grantees under that program or fiscal operation and/or management of the grant or project. (Applies to grants that have been awarded for six months or longer at the time of the risk assessment.)
- (b) In the program progress report, a recipient self-identifies its program as making inadequate progress or having results that are below acceptable quality.
- (c) Since the last programmatic progress report submission, the Program Officer believes the grantee is no longer making reasonable progress and has documented the change in progress in key correspondence with the grantee.

“No” response - required when: None of the factors described above are met.

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“N/A” response - required when:

- (a) The grant has been awarded for a period of less than six months at the time of the risk assessment.

6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) A Learn and Serve grantee reporting for the period ending its first year of operation reports any one or more of the following: 1) subgrants have not yet been made; 2) a search is underway for a new community partner because the partner written into the grant application is unable to fulfill the agreed upon requirements; 3) no monitoring of subgrantees has been reported; 4) activities reported on are not related to the purpose of the grant application; or, 5) narrative responses are vague and do not provide clear documentation of progress to date in any of the above narrative areas.
- (b) A State Commission reports via their Administrative Funds application that it has not been successful in meeting the goals listed in its State Service Plan.
- (c) An AmeriCorps National Direct grantee’s progress report does not include information regarding their site monitoring activities during the reporting period.

7. Source Documentation (Where to Look): The source documentation which supports the determination of a “Yes” or “No” for this criterion are:

- (a) A review or assessment of the most recent submission of the Programmatic Progress Report.
- (b) Key documentation indicating a change in overall progress since the last programmatic progress report submission.

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, comments are required only if the “yes” determination does not relate directly back to the last programmatic progress report submission. (When it relates back to the last progress report submission, it is implicit that it is attributable to the last progress report and supporting feedback.) If the “yes” determination is based on subsequent key documentation, comments must briefly indicate the nature of concern and identify the documentation source.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.

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(c) When there is a determination of “N/A” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: None

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: MULTI-SITE PROGRAM		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 16

1. **Risk Assessment Category:** Programmatic
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Multi-Site Program” within the “Programmatic” assessment category.
3. **Criterion Summary Statement:** This criterion applies to programs that function as intermediary organizations or other component projects that are responsible for managing / allocating resources to multiple operating sites, subgrantees, or subrecipients. Vulnerability is associated with a high number of operating sites.
4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) Intermediary Organization: An organization that serves as a direct recipient of Corporation resources and then subgrants or suballocates those resources into the community. Examples: A State Commission acts as an intermediary organization that allocates CNCS funds to subgrantees within the state. An AmeriCorps*Direct grantee acts as an intermediary organization that subgrants CNCS funds to operating sites in two or more states.
 - (c) Operating Site: A local organization that implements grant activities at a local level.
 - (d) Subrecipient / Subgrantee: An organization that receives CNCS grant funds from a CNCS grantee and not directly from the Corporation.
 - (e) Component Project (Senior Corps only): A decentralized local project that operates with a main office and one or more satellite or “component” offices funded by Corporation or non-Corporation sources. To qualify, the project’s component office(s) is staffed by a coordinator or coordinators with management oversight responsibility for at least 10 Volunteer Service Years (VSYs) or 50 budgeted RSVP volunteers. Component projects generally do not have their own grant numbers in eGrants; rather, components are attached to the primary grant number.

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5. User Instructions: A “Yes,” “No,” or “Not Applicable (N/A)” response is required for this criterion. A “Yes” response is an indication that the factor is present.

“Yes” response - required when any one of these factors are met:

(a) A prime grantee/sponsor is responsible for the management of a large number of operating / subrecipient sites. Program-specific criteria for what constitutes a “large” number is as follows:

- AmeriCorps*National: 20 or more sites
- AmeriCorps*VISTA: 8 or more sites
- Senior Corps: 5 or more sites
- Special Initiatives: sites in 2 or more states *or* 2 or more distinct jurisdictions within a single state
- Learn and Serve America: Higher Education Consortia, Tribes or U.S. Territories with 2 or more sites

“No” response - required when: None of the factors described above are met.

“N/A” response - required when:

(a) The grant is awarded to one of the following (certain programs (identified below) are automatically considered multi-site by the nature of the program (i.e., awards made to agencies who in turn automatically fund multiple subgrants)):

- AmeriCorps*State: State Commission
- Learn and Serve America: State Education Agency; State Commission; Grantmaking Entities

(b) The grant is an OLD T/TA cooperative agreement. (While these projects support multiple CNCS recipients through an array of methods, these are not multi-site in the context of this criterion.)

6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) An intermediary organization subgrants resources to a number of organizations that exceeds the program specific threshold.
- (b) A large project partners with other organizations who serve as operating sites of the overall project. (This does not necessarily refer to a project that merely places members or volunteers with other organizations.)

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- (c) A statewide Foster Grandparent project receiving Corporation funds operates from its central office in the middle of the state and establishes five satellite offices to manage separate geographic regions, each with its own coordinator, files, and volunteers. Each satellite office is a “component” of the project.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” for this criterion are:

- (a) Project / Grant application;
- (b) Notice of Grant Award / Memorandum of Agreement.

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, no comments are necessary.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.
- (c) When there is a determination of “N/A” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: None

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: PARTICIPANT ENROLLMENT / RETENTION		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 19

1. **Risk Assessment Category:** Programmatic
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Participant Enrollment / Retention” within the “Programmatic” assessment category.
3. **Criterion Summary Statement:** This criterion is designed to recognize vulnerability associated with grantees that do not enroll or do not retain participants at the level identified in the project goals of the grant award. (This includes intermediary organizations (e.g., State Commissions) who oversee the enrollment/retention activities of subrecipients.) These are typically categorized as member enrollment, Volunteer Service Years (VSYs), Member Service Years (MSYs), or some other measure of participant on-board strength. This does not include community volunteers who are mobilized by participants.
4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) Participant Enrollment: Refers to the enrollment of participants in a CNCS funded grant program. This does not include community volunteers who are mobilized by participants.
 - (b) Participant Retention: Refers to the ability of a CNCS funded grant program to retain the participants that it enrolls.
 - (c) Volunteer Service Year (VSY): Budgeting unit of measure used by CNCS programs (e.g., for the Senior Corps’ Foster Grandparent and Senior Companion Programs, one VSY equals 1,044 hours).
 - (d) Member Service Year (MSY): Budgeting unit of measure used by CNCS programs (i.e., AmeriCorps*State/National).
5. **User Instructions:** A “Yes,” “No,” or “Not Applicable (N/A)” response is required for this criterion. A “Yes” response is an indication that the factor is present.
 - “Yes” response - required when any one of these factors are met:**
 - (a) After one year of project operations, the recipient/sponsor is failing to meet at least 50% of its participant enrollment or retention levels proposed in its application.
 - (b) After two years or more of project operations, the recipient/sponsor is failing to cumulatively meet at least 75% of its participant enrollment or retention levels proposed in its application.

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(c) A demonstrated high level of turnover, as determined by the Program Officer.

(d) The recipient is failing to meet thresholds established through Corporation program policies (e.g., *Senior Corps Policy 850: Maintenance and Management of Foster Grandparent Program and Senior Companion Program Volunteer Service Years*).

“No” response - required when: None of the factors described above are met.

“N/A” response - required when:

(a) The grant does not require the formal enrollment and tracking of National Service participants or members (such as programs with a primary objective of recruiting community volunteers).

6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

(a) The recipient filled only 45% of its participant level after one year of project operations.

(b) The recipient’s final year application reflects that the recipient is failing to meet at least 75% of its national service level proposed in the original application.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” for this criterion are:

(a) Program Progress Report;

(b) SPAN;

(c) Correspondence with the recipient/sponsor confirming the problem exists.

8. Comments Required in Risk Assessment eGrants Record:

(a) When there is a determination of “Yes” for this criterion, indicate the factor(s) the recipient has met.

(b) When there is a determination of “No” for this criterion, no comments are necessary.

(c) When there is a determination of “N/A” for this criterion, no comments are necessary.

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9. **Reference Documents and Other Resources:** None

10. **Control and Maintenance.** Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: INNOVATIVE / UNTESTED PROGRAM / PROJECT DESIGN		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 22

1. **Risk Assessment Category:** Programmatic
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Innovative/Untested Program/Project Design” within the “Programmatic” assessment category.
3. **Criterion Summary Statement:** This criterion applies to a program that possesses an innovative and untested design and/or is carried out by a new or non-typical partnership of organizations without a track record of successful collaboration.

Despite the most careful proposal solicitation, review, and award, the presence of certain program characteristics, while not necessarily predicting program failure, are acknowledged as making success more difficult to achieve compared to programs that lack these characteristics. Yet an important role for the Corporation is to ensure that its overall program effort includes potentially high-reward/high-risk program strategies – possibly best characterized as the “innovative, high-risk” component of the Corporation’s portfolio.

4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) Innovative / Untested Program Design: A strategy or service activity for which there is no relevant experience that would predict success.
 - (b) New / Non-Typical Partnership: A partnership, critical to the success of the program, which comprises organizations with little or no experience with operational collaboration or is atypical in nature.
5. **User Instructions:** A “Yes,” “No,” or “Not Applicable (N/A)” response is required for this criterion. A “Yes” response is an indication that the factor is present.
 - “Yes” response - required when any one of these factors are met:**
 - (a) The program is based on an innovative or untested program design.
 - (b) The program has in place a new or non-typical partnership.
 - “No” response - required when:** None of the factors described above are met.
 - “N/A” response - required when:**
 - (a) The project is an OLDT T/TA cooperative agreement. The very nature of these projects is to be innovative. Any concerns or potential vulnerabilities are identified through other risk assessment criteria.

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6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) A CNCS recipient/sponsor proposed a new partnership among community and faith-based organizations that had little or no experience collaborating within the community.
- (b) A CNCS recipient/sponsor proposed to carry out an as-yet untested service activity.
- (c) Learn and Serve America: In response to a Learn and Serve priority to fund demonstration programs that collaborate with Department of Education Safe School grantees, an applicant proposes to implement a service-learning program in two school districts that are recipients of large/complex Education grants. It is an unknown whether or not the two grants will compete for scarce staff and administration time/resources or compliment each other, resulting in a seamless program delivery.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” or “No” for this criterion are:

- (a) The proposal narrative and documentation of the proposal review comprise the primary information to support a determination.

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, comments must briefly identify the circumstance supporting the determination.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.
- (c) When there is a determination of “N/A” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: None

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: MAJOR CHANGES IN PROJECT DESIGN / SCOPE		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 24

1. **Risk Assessment Category:** Programmatic
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Major Changes in Project Design / Scope” within the “Programmatic” assessment category.
3. **Criterion Summary Statement:** Potential vulnerability is associated with changes in key elements of the project, as identified in the initial design (work plan) of the CNCS funded program. Such changes would include major additions/decreases or major changes in the types of: (1) participants, partners, or target beneficiaries; (2) service areas; or, (3) project scope, both geographic and programmatic.

This criterion is based exclusively upon post-award change. It is assumed that the project design was determined to be adequate and appropriate when the project was initiated and funded. Potential vulnerabilities would be associated with the above changes only if the changes are proposed or originated by the project or recipient. If the Corporation proposes the change or addition/decrease, it is assumed the Corporation has evaluated the program’s capacity to make the change effectively and the risk assessment would not be affected.

4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) “Major” refers to any increase, decrease, or change in the above elements that raises questions about the organization’s ability or capacity to achieve its stated performance measures.
5. **User Instructions:** A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.

“Yes” response - required when any one of these factors are met:

- (a) There is a major increase, decrease, or change in type for any of the following:
 - Participants, including program/project members or volunteers, but not counting community volunteers leveraged.
 - Program/project partners.
 - Program/project target beneficiaries.
 - Program/project service areas.
- (b) For OLDT T/TA Providers only – there is a major T/TA work plan change proposed by the provider due to one or both of the following:

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- Inadequate capacity by provider in terms of knowledge, skill, or expertise.
- Inadequate planning by provider.

- “No” response - required when:** None of the factors described above are met.
- “N/A” response - not a selection option for this criterion.**

6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) The organization doubled its program/project members.
- (b) The organization took on a new partner.
- (c) The organization eliminated a group as target beneficiaries.
- (d) The organization reduced its activities in a given service area by 50%.
- (e) The organization opened a new service area.
- (f) The organization added new subgrantee sites.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” for this criterion are:

- (a) Programmatic Progress Reports;
- (b) Outcomes from monitoring visits or meetings;
- (c) Requests for amendments to the grant/award;
- (d) Routine correspondence or communications with the recipient.

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, comments must briefly indicate:
 - The type of increase, decrease, change, or activity that led to the conclusion;
 - The documentation, if any, that supports the conclusion, and where that documentation is found.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.

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9. **Reference Documents and Other Resources:** None

10. **Control and Maintenance.** Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: LARGE RECIPIENT / MULTIPLE AWARDS		
Responsible Lead: Grants Officer	Revision: 06/27/2006	Page: 27

1. **Risk Assessment Category:** Financial
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Large Recipient / Multiple Awards” within the “Financial” assessment category.
3. **Criterion Summary Statement:** This criterion is designed to recognize when a grantee has received large amounts of federal grant funds or multiple awards from the Corporation. These circumstances lead to an inherent vulnerability associated with safeguarding large sums of federal dollars or federal dollars awarded through multiple grant awards. This criterion also recognizes when a grantee receives a large number of participant positions in their award.
4. **Terms and Definitions:** Terminology unique to this criterion are: None
5. **User Instructions:** A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.

“Yes” response - required when any one of these factors are met:

- (a) The annual award amount for a grant award equals or exceeds the dollar threshold specified below:

(Note: For two- or three-year grants awarded up-front, annualize the year-by-year amount to determine the proper amount for comparison against the thresholds below.)

• AmeriCorps*State	\$ 3,000,000
• AmeriCorps* National	\$ 1,000,000
• Foster Grandparent/ Senior Companion Programs	\$ 300,000
• RSVP (Retired & Senior Volunteer Program)	\$ 80,000
• AmeriCorps*VISTA Program Grant	\$ 500,000
• Learn and Serve America	\$ 500,000
• OLDT T/TA Cooperative Agreements	\$ 1,000,000
• All Other Programs	\$ 500,000

- (b) The recipient has a total of two or more active awards from the Corporation.
(Exception: AmeriCorps*State grants to State Commissions are not applicable to this one factor – multiple awards – since all receive multiple CNCS awards.)
- (c) The recipient has a total of 500 or more participant positions in their award.
- (d) A VISTA standard project has 10 or more members.

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- “No” response - required when:** None of the factors described above are met.
- “N/A” response - not a selection option for this criterion.**

6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) An AmeriCorps*State Commission received more than \$3 million within the last 12 months.
- (b) An AmeriCorps*Education Award grant includes 200 Member Service Years (MSYs) which represents over 800 member positions.
- (c) An organization sponsors both a Foster Grandparent Program (\$280,000) and RSVP program (\$45,000).
- (d) An organization has an AmeriCorps*VISTA project (\$30,000 S&T grant), an AmeriCorps*National award (\$200,000), and a Special Volunteer Program (\$500,000).

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” or “No” for this criterion are:

- (a) Current budget(s);
- (b) Most recent Notice of Grant Award (NGA) / current award(s);
- (c) eGrants query results.

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, comments must briefly indicate the factor(s) the recipient has met.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: Notice of Grant Award (NGAs), A-133 Audits, and “Organization History” report via eGrants – Grant Award/Grant Officer Certification (lists award history for each grantee and gives grant numbers).

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: LARGE UNOBLIGATED / UNEXPENDED BALANCES		
Responsible Lead: Grants Officer	Revision: 06/27/2006	Page: 29

1. **Risk Assessment Category:** Financial
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Large Unobligated / Unexpended Balances” within the “Financial” assessment category.
3. **Criterion Summary Statement:** This criterion is designed to recognize when a recipient has received federal award assistance but is not using the funds or other assistance provided on a schedule that would typically be necessary and associated with successful performance. Without timely, regular, and systematic use of the award funds, the likelihood that there is a problem with the recipient’s ability to operate the program is higher (e.g., failing to hire staff or to issue subgrants) than when a recipient is obligating and expending award funds on a consistent and regular schedule.
4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) Obligate Funds / Obligations: After an award is made, federal assistance under that award is obligated when the grantee/sponsor establishes a legally binding agreement to pay for goods or services from which there is a penalty for failing to honor the agreement. The amount obligated is reported to the grants office, typically on semi-annual cycles, but may be reported annually or quarterly. Obligations are typically established by employee payroll time and attendance systems, contracts, agreements, and purchase orders issued by the grantee.
 - (b) Expend Funds: Grants funds are obligated once a grantee/sponsor has established a legally binding agreement for the use of grant funds. As goods and services are received and accepted by the grantee/sponsor for the obligations made, grant funds are **expended** as the bills and invoices are paid for those obligations.
 - (c) Drawdown Funds: The process a grantee/sponsor uses to request and receive grant funds into their account from the U.S. Treasury. The grants office monitors the current amount drawdown by accessing the HHS Payment Management System. Typically, funds are drawdown electronically and should be drawdown only when needed to pay bills, invoices, and payroll expenses.

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5. **User Instructions:** A “Yes,” “No,” or “Not Applicable (N/A)” response is required for this criterion. A “Yes” response is an indication that the factor is present.

“Yes” response - required when any one of these factors are met:

With respect to levels of *unobligated* federal funds^{1 2 3} –

- (a) After one year or more of grant program activity under the current grant, the grantee/sponsor has not obligated at least 50% of the total, cumulative grant funding.

Calculation: $(\text{amount obligated} \div \text{amount awarded}) \times 100 = \% \text{ of funds obligated}$

- (b) After 24 months or more (two award cycles under one grant) of grant program activity under the current grant, the grantee/sponsor has not obligated¹ at least 75% of the total, cumulative grant funding.

Calculation: $(\text{amount obligated} \div \text{amount awarded}) \times 100 = \% \text{ of funds obligated}$

With respect to levels of *unexpended* federal funds –

- (c) After one year or more of grant program activity under the current grant, the grantee/sponsor’s rate of expending funds (paying obligations) is less than 50% of the amount of funds obligated.

Calculation: $\text{amount obligated} \div 2 = \text{threshold}$

If amount expended to date < threshold, the factor is “yes”

“No” response - required when:

- (a) None of the factors described above are met *and* the grant has been awarded for more than 12 months at the time of the risk assessment.

1 Assessment is based on OBLIGATION of funds, NOT on EXPENDITURE AND/OR DRAWDOWN of funds because some grantees may choose to use their own or other sponsor’s funds temporarily, delay drawing down funds until all book keeping is validated, audited, etc. Therefore, a FSR is the only source of information used to assess this criterion. Payment management system reports, including SF 272s, are not used for this criterion.

2 All financial reporting on FSRs is cumulative to-date for the “period covered by this report” shown in block 9 on the SF 269A.

3 The “total federal funds authorized for this funding period,” line 10h on SF 269A, only includes federal funds awarded and available for the period covered by a financial report. Amounts awarded in advance to fund an upcoming budget period beyond the period covered by a report are not included in the reported amounts.

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“N/A” response - required when:

- (a) The grant has been awarded for less than 12 months at the time of the risk assessment.
- (b) The project is a VISTA standard project that does not receive a support grant.

6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) The grantee/sponsor received a \$100,000 award/program over one (1) year ago, but has only obligated \$20,000 after one year (20%). This does not meet the 50% threshold.

$$[(\$20,000 \div \$100,000) \times 100 = 20 \%]$$

- (b) The grantee/sponsor received \$200,000 (e.g., two \$100,000 awards under one grant), and after 24 months has obligated \$150,000 (75%) of the federal grant funds, but expended (paid out) only \$50,000 (25%). The threshold falls below the minimum of \$75,000 or 50% of obligations paid.

$$[\$150,000 \div 2 = \$75,000 \text{ (50\% threshold)}; \text{ since } \$50,000 \text{ (amount expended) is less than } \$75,000 \text{ (threshold), the criterion factor exists}]$$

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” for this criterion is:

- (a) Financial Status Report.³ Obtain the cumulative amount of award, obligations and expenditures as follows:
 - i. Total federal funds awarded is found at SF-269A line 10h, column III (Total Federal funds authorized for this funding period)
 - ii. Total federal funds obligated is found at SF-269A line 10g, column III (Total Federal share (sum of lines c and f))
 - iii. Total federal funds expended is found at SF-269A line 10c, column III (Federal share of outlays)

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, comments must identify the percentage of underused (unexpended or unobligated) grant funds and the amounts used to calculate the percentages.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.

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- (c) When there is a determination of “N/A” for this criterion, no comments are necessary. The grant award date relative to the date of the risk assessment is a sufficient record to reflect that the grant has been awarded for less than 12 months.
- 9. Reference Documents and Other Resources:** Notice of Grant Award (NGA), Payment Management System, Financial Status Reports.
- 10. Control and Maintenance.** Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: FINANCIAL WEAKNESS		
Responsible Lead: Grants Officer	Revision: 06/27/2006	Page: 33

1. **Risk Assessment Category:** Financial
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Financial Weakness” within the “Financial” assessment category.
3. **Criterion Summary Statement:** This criterion is designed to recognize vulnerability generated when a grantee does not meet the financial requirements of the grant/award or spending patterns indicate unusually high rates of spending or low rates of providing non-federal funds. It is also designed to recognize vulnerability when information indicates a major future reduction in fundamental financial solvency of the grantee organization.
4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) Financial Status Report (FSR) Short Form or SF 269A: OMB government-wide form used by the recipient to report expenditures over a designated period of time. The Corporation does not currently use the SF 269 long form version.
 - (b) Federal Cash Transactions Report (FCTR) or SF 272: OMB government-wide form used by the recipient to report cash flow over a designated period of time. When used for the Payment Management System, it is often identified as a PMS 272 or PSC 272.
 - (c) Required Match: The legislated amount of funds (cash or in-kind) that a recipient is required to provide in support of the federal grant.
 - (d) Budgeted Match: The total amount of cash or in-kind the recipient committed, within the application, to provide in support of the federal grant.
 - (e) HHS/PMS: The payment management system used by the Corporation to disperse grant/award funds.
 - (f) Drawdown: The amount of funds the recipient draws down from the awarded funds in HHS/PMS.
5. **User Instructions:** A “Yes,” “No,” or “Not Applicable (N/A)” response is required for this criterion. A “Yes” response is an indication that the factor is present.
 - “Yes” response - required when any of these factors are met:**
 - (a) The factors specified in the table below are met for the FSR applicable at the time of the assessment (last FSR received):

Financial Status Report - SF 269A Cumulative Reporting Period	Rate of Obligation Indicates Potential Risk of Running Out of Funding During Budget Period	Level of Match Achieved (Cumulative) Indicates Potential Risk of Under-matching	Variance Between Funds Drawdown & Amount Reported on Federal Cash Transactions Report - SF 272 Indicates Potential Risk of Inadequate Reconciliation
FSR 1 6 Months	> 75% of cumulative year 1 funding is reported as obligated	No measure required	Amounts reported as drawn and disbursed on SF 272 vary from the actual cumulative amount drawdown as of the date of the SF 272 by 20% +/-
FSR 2 12 Months	> 100% of cumulative year 1 funding is reported as obligated	<50% of required matching reported for year 1 cumulative funding	Same as above
FSR 3 18 Months	> 90% of cumulative year 1 + year 2 funding is reported as obligated	<60% of required matching reported for cumulative year 1 + year 2 funding	Same as above
FSR 4 24 Months	> 100% of cumulative year 1 + year 2 funding is reported as obligated	<70% of required matching reported for cumulative year 1 + year 2 funding	Same as above
FSR 5 30 Months	> 90% of cumulative years 1 + 2 + 3 funding is reported as obligated	<80% of required matching reported for cumulative years 1 + 2 + 3 funding	Same as above
FSR 6 36 Months and any subsequent extended periods	> 100% of cumulative years 1 + 2 + 3 funding is reported as obligated	<90% of required matching reported for cumulative years 1 + 2 + 3 funding	Same as above

Remember: The “total federal funds authorized for this funding period,” line 10h on SF 269A, only includes federal funds awarded and available for the period covered by a financial report. Amounts awarded in advance to fund an upcoming budget period beyond the period covered by a report are not included in the reported amounts.

- (b) Through the course of daily business, the Grants Officer is aware of one or more of the following (*Note* – if any of the following factors were identified through a CNCS OIG audit or A-133/Single audit, they are applicable under the “Open Audit Findings” criterion and not this criterion):
- i. A bankruptcy filing has been made or intent to file announced;
 - ii. Major funding sources other than CNCS have withdrawn prior funding commitments or indicated an intent to withdraw; or,

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iii. Another federal or state agency has notified CNCS regarding a weakening of the organization's financial solvency or inappropriate use of non-CNCS funds.

- “No” response - required when:** None of the factors described above are met.
- “N/A” response - required when:**
 - (a) The grant has been awarded for six months or less and the due date for the first Financial Status Report has not been reached.
 - (b) The project is a VISTA standard project that does not receive a support grant.

6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) A recipient has been awarded \$1 million for the budget period and has reported cumulative obligations of \$800,000 from the award in the first (1st) reporting period of the Financial Status Report (SF 269A). Therefore, at 6-months, the grantee has spent 80% of federal funds, exceeding the 75% threshold, with only 50% of the first year's budget period elapsed.
- (b) A review of HHS drawdown data reflects that \$600,000 was drawn down as of the date of the last Federal Cash Transactions Report (SF 272), however the SF 272 for that date reflects \$400,000 expended. The variance is greater than 20%.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” or “No” for this criterion are:

- (a) Current budget(s) or award(s);
- (b) HHS/PMS Query using the amounts drawn down on the date that most closely approximates the reporting dates for the most recent SF 272 on file;
- (c) Most recent Financial Status Report (SF 269);
- (d) Most recent Federal Cash Transactions Report (SF 272).

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, comments must briefly identify the factor(s) the recipient has met.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.

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(c) When there is a determination of “N/A” for this criterion, no comments are necessary.

9. **Reference Documents and Other Resources:** Notice of Grant Award (NGA), Financial Status Report, Federal Cash Transactions Report, eGrants.
10. **Control and Maintenance.** Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: INCOMPLETE / LATE PROGRESS REPORTS		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 37

1. **Risk Assessment Category:** Compliance
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Incomplete / Late Progress Reports” within the “Compliance” assessment category.
3. **Criterion Summary Statement:** The Progress Report is the primary vehicle through which recipients/sponsors document and CNCS program managers review:
 - Programmatic activities
 - Accomplishments and outcomes achieved
 - Success stories
 - Challenges
 - Training and Technical Assistance Requests

The Corporation’s expectations of Progress Report submissions by recipients are such that:

- Sufficient details are included to enable the report to serve as a record of progress toward meeting the objectives of the grant/program and are relevant to the purpose of the award;
 - All required fields are completed and are completed accurately; and
 - The report is submitted by the established due date, or by an extended due date established in advance of the original due date.
4. **Terms and Definitions:** Terminology unique to this criterion are: None
 5. **User Instructions:** A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
 - “Yes” response - required when any one of these factors are met:**
 - (a) The Progress Report cannot stand alone as a record of progress, activities, and achievements.
 - (b) The Progress Report does not contain all required information.
 - (c) The Progress Report was not submitted by the established due date.
 - “No” response - required when:** None of the factors described above are met.

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“N/A” response - not a selection option for this criterion.

6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) The Progress Report was received by the specified due date, but the recipient’s reporting of progress toward meeting the goals of the work plans was not updated.
- (b) The Progress Report was received by the specified due date, but required content was omitted from the submission.
- (c) The Progress Report was due June 30 but was not submitted until July 1.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” or “No” for this criterion are:

- (a) A review or assessment of the most recent submission of the Programmatic Progress Report;
- (b) A comparison in eGrants/WBRS of the established due date to the actual date of submission.

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, no comments are necessary.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: None

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: INCOMPLETE / LATE FINANCIAL STATUS REPORTS		
Responsible Lead: Grants Officer	Revision: 06/27/2006	Page: 39

1. **Risk Assessment Category:** Compliance
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Incomplete / Late Financial Status Reports” within the “Compliance” assessment category.
3. **Criterion Summary Statement:** The Financial Status Report is the primary vehicle through which recipients/sponsors document and CNCS grant managers review recipient expenditure levels and percentages of matching funds. The Corporation’s expectations of Financial Status Report submissions by recipients are such that:
 - Sufficient details are included to track expenditures and levels of match funds from report to report;
 - A determination can be made as to whether there is a problem with the rate at which the recipient draws down funds;
 - All required fields are completed and are completed accurately; and
 - The report is submitted by the established due date, or by an extended due date established in advance of the original due date.
4. **Terms and Definitions:** Terminology unique to this criterion are: None
5. **User Instructions:** A “Yes,” “No,” or “Not Applicable (N/A)” response is required for this criterion. A “Yes” response is an indication that the factor is present.
 - “Yes” response - required when any one of these factors are met:**
 - (a) The Financial Status Report does not contain all required information.
 - (b) The Financial Status Report reflects inaccurate reporting data.
 - (c) The Financial Status Report was not submitted by the established due date.
 - “No” response - required when:** None of the factors described above are met.
 - “N/A” response - required when:**
 - (a) The project is a VISTA standard project that does not receive a support grant.

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6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) The Financial Status Report was received by the specified due date, but required content was omitted from the submission.
- (b) The Financial Status Report was completed, but not all information was correct.
- (c) The Financial Status Report was due June 30 but was not submitted until July 1.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” or “No” for this criterion are:

- (a) A review or assessment of the most recent submission of the Financial Status Report;
- (b) A comparison in eGrants of the established due date (original or extended) to the actual date of submission.

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, no comments are necessary.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.
- (c) When there is a determination of “N/A” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: Notice of Grant Award (NGA), Payment Management System, eGrants, application instructions.

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: NON-RESPONSIVE RECIPIENT		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 41

1. **Risk Assessment Category:** Compliance
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Non-Responsive Recipient” within the “Compliance” assessment category.
3. **Criterion Summary Statement:** This criterion is designed to recognize when a recipient has, based on the factors described in Section 5, been unsuccessful in addressing issues raised by the Corporation as needing correction or action.
4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) Pattern: A total of three or more occurrences of non-responsiveness within the last 12 months.
 - (b) Documented: The action taken by an agent of the Corporation that records the non-responsiveness of the grantee in an official record or communiqué.
5. **User Instructions:** A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.
 - “Yes” response - required when any one of these factors are met:**

During the period of assessment, the recipient:

 - (a) Demonstrated a pattern such as failures to meet deadlines or delinquency of reporting;
 - (b) Disregarded instructions by the Corporation and did not perform a corrective action as required;
 - (c) Did not acknowledge, as required, a direct official notification or mandate by the Corporation; or,
 - (d) Did not participate in a mandatory training or technical assistance event as required by the Corporation.
 - “No” response - required when:** None of the factors described above are met.
 - “N/A” response - not a selection option for this criterion.**

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6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) Submission records show that a grantee has an established pattern for submitting Progress Reports and/or Financial Status Reports after the posted deadlines and without authorized deadline extensions.
- (b) Continuation grant negotiations are protracted due to grantee non-responsiveness resulting in a slip of the award date.
- (c) The grantee does not respond to an official request by the Corporation.
- (d) Corrective actions requested by the Corporation are not carried out.

7. Source Documentation (Where to Look): Grantee lack of responsiveness must be documented to be valid. The source documentation which supports the determination of “Yes” for this criterion are:

- (a) Submission dates generated by CNCS reporting systems (i.e., eGrants, WBRs);
- (b) Corporation comments in staff review and comments screens;
- (c) Contents of grantee report submissions, as are applicable;
- (d) Monitoring feedback/follow up letters.

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, comments must be sufficient to identify the general area(s) of concern.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: None

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion:		
OPEN AUDIT FINDINGS		
Responsible Lead: Grants Officer	Revision: 06/27/2006	Page: 43

1. **Risk Assessment Category:** Compliance
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “Open Audit Findings” within the “Compliance” assessment category.
3. **Criterion Summary Statement:** This criterion is designed to account for open, unresolved audit findings (financial and/or programmatic) present for a particular recipient. Two types of audits are examined: 1) OMB Circular A-133 single audits, which are performed pursuant to the Single Audit Act of 1984 (P.L., 98-502), as amended by the Single Audit Act Amendments of 1996 (P.L.104-156), and; 2) audits performed by the CNCS Office of Inspector General. Audit findings which lead to a ”yes” determination under this criterion are those which are either identified against the specific CNCS grant being assessed, or are identified against the organization and/or a non-CNCS grant but are of such significance that the integrity of CNCS-funded activities are placed at risk.
4. **Terms and Definitions:** Terminology unique to this criterion are:
 - (a) Audit: For the purposes of this criterion, an audit that was completed no more than three (3) years prior to the date of the risk assessment.
 - (b) Audit Finding: Deficiencies which the auditor is required to report in the summary of findings and schedule of questioned costs.
 - (c) Compliance Finding: A finding which reflects that the auditee has not complied with laws, regulations, and the provisions of contracts or grant agreements that may have a direct and material effect on each of its major programs.
 - (d) Disclaimed Opinion: A disclaimer of opinion which states that the auditor does not express an opinion, compared to an adverse statement which lists one or more material weaknesses.
 - (e) Illegal Acts: Civil or criminal noncompliance in which the requirement not followed or the prohibition violated is a statute or regulation.
 - (f) Material Weakness: A reportable condition in an audit report resulting from the auditor’s professional judgment that a high degree of risk exists with respect to the financial or operational issue that was audited.
 - (g) Questioned Cost: An expenditure charged to a grant that is questioned by the auditor because of an audit finding.

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- (h) **Reportable Condition:** One or more control deficiencies that in the auditor’s judgment represent significant deficiencies in the design or operation of internal control that could adversely affect the organization's ability to meet its internal control objectives. Also, any matter coming to the auditor’s attention that, in his or her judgment, should be communicated because it represents a significant deficiency in the design or operation of internal control which could adversely affect the organization’s ability to record, process, summarize, and report financial data.
- (i) **Single Audit (a/k/a, “A-133 Audit”):** An audit of a non-federal entity performed by an external party examining both the entity’s financial statements and federal awards. Required under OMB Circular A-133 for non-federal entities expending \$500,000 or more in federal funds annually.

5. User Instructions: A “Yes” or “No” response is required for this criterion. A “Yes” response is an indication that the factor is present.

“Yes” response - required when any one of these factors are met:

Open, unresolved audit findings exist for any one of the following:

- (a) Any audit reports allegations of illegal acts related to any activity under any grant or non-grant operations of the recipient.
- (b) A Single Audit identifies one or more material weakness(s) related to the organization’s non-CNCS programs and grants regarding matters and/or activities likely to exist under CNCS programs or grants (e.g., time and attendance, procurement practices).
- (c) A Single Audit identifies one or more compliance findings of any nature, rising from the examination of CNCS programs and/or grants.
- (d) Any audit reports a lack of monitoring of subgrantees by the parent organization.
- (e) Questioned costs for a CNCS award(s) are greater than 10% of the award.

“No” response - required when: None of the factors described above are met or an audit has not been performed during the previous three years.

“N/A” response - not a selection option for this criterion.

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6. Examples:

A “Yes” response to this criterion is appropriate in instances such as:

- (a) The audit questions more than 10% of the funds expended by the recipient.
- (b) The recipient has found to be in non-compliance with CNCS rules and/or procedures.

7. Source Documentation (Where to Look): The source documentation which supports the determination of “Yes” or “No” for this criterion are:

- (a) Single Audit (A-133 Audit);
- (b) CNCS OIG Audit;

8. Comments Required in Risk Assessment eGrants Record:

- (a) When there is a determination of “Yes” for this criterion, comments must briefly indicate which factor(s) the recipient has met.
- (b) When there is a determination of “No” for this criterion, no comments are necessary.

9. Reference Documents and Other Resources: Federal Audit Clearinghouse (<http://harvester.census.gov/sac/>); eGrants Audit Module and Grants Officer Certification Screen

10. Control and Maintenance. Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.

Corporation for National and Community Service		
Corporation-Wide Monitoring Risk Assessment Criterion: PROGRAM SPECIFIC: OLDT ONE OR MORE PARTNERS OR SUBCONTRACTORS		
Responsible Lead: Program Officer	Revision: 06/27/2006	Page: 46

1. **Risk Assessment Category:** Program Specific
2. **Context:** This criterion establishes the Corporation-wide standard for determining monitoring priority levels based upon “One or More Partners or Subcontractors” for OLDT only within the “Program Specific” assessment category.
3. **Criterion Summary Statement:** This criterion applies to national training and technical assistance providers that (a) operate in a partnership to provide training and technical assistance services in a single cooperative agreement, or (b) subcontract to one or more organizations for the provision of those services. Vulnerability is associated with a higher number of partners and/or subcontractors. In determining vulnerability, it is important to consider both the compliance and quality of services of partners and subcontractors.
4. **Terms and Definitions:** Terminology unique to this criterion are: None
5. **User Instructions:** A “Yes,” “No,” or “Not Applicable (N/A)” response is required for this criterion. A “Yes” response is an indication that the factor is present.
 - “Yes” response - required when any one of these factors are met:**
 - (a) A national training and technical assistance provider consists of two or more partners carrying out the cooperative agreement.
 - (b) A provider has one or more subcontracts with other entities to carry out substantial activities under this agreement.
 - “No” response - required when:** None of the factors described above are met.
 - “N/A” response - required when:**
 - (a) The T/TA project is not administered within OLDT.
6. **Examples:**

A “Yes” response to this criterion is appropriate in instances such as:

 - (a) A cooperative agreement has one or more subcontractors or other partners on which they rely for the delivery of services.

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7. **Source Documentation (Where to Look):** The source documentation which supports the determination of “Yes” for this criterion are:
 - (a) Cooperative Agreement;
 - (b) Correspondence from the provider alerting to the use of a subcontract(s) or partner(s).
8. **Comments Required in Risk Assessment eGrants Record:**
 - (a) When there is a determination of “Yes” for this criterion, comments must briefly indicate whether there is presence of a subcontract(s), partner(s), or both.
 - (b) When there is a determination of “No” for this criterion, no comments are necessary.
 - (c) When there is a determination of “N/A” for this criterion, no comments are necessary.
9. **Reference Documents and Other Resources:** None
10. **Control and Maintenance.** Control and maintenance of this document will be in accordance with the procedures for maintaining all Corporation-wide risk assessment requirements. The Office of Award Oversight and Monitoring is responsible for updating and maintaining this criterion.